

## EXHIBIT 278

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**From:** Foster, Timothy [/O=MCKESSON/OU=NORTH AMERICA/CN=RECIPIENTS/CN=EAFDJEO]  
**Sent:** 11/2/2013 1:57:38 PM  
**To:** Graziano, David [david.graziano@mckesson.com]  
**Subject:** RE: CSCP Tracker

Dave...Per our convo here is some talking points my team has seen as well as below the specs on Marc's. The store numbers make sense im sure to you not me. Of note is the difference in yellow. My understanding is that this detail is NOT to be shared with the customer. According to Joe, the stores should know their purchases. Anyways these accounts will have the opportunity to fill out and have reviewed their threshold. That is done by the third document, the Threshold Change Form. Once completed regulatory will review and assess the threshold request. As you heard, changes to the new threshold will be the exception not the rule. Call me if you have any questions.

DEA #	Cust Name	DC	Base Code	Base Name	Rx Doses	Controlled Dose Average	Prior Threshold	Actual Base Average	Calc New Target Threhsold	Adjusted New Target Threshold	Difference (Target - Prior)
BM1143039	MARC'S 14BV	8772	2882	Alprazolam	456147.412	12980.25369	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
BM2400872	MARC'S 22TH	8772	2882	Alprazolam	1083119.563	26021.23484	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
BM3105524	MARC'S 27WT	8772	2882	Alprazolam	767160.617	21830.52927	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
BM3887809	MARC'S 39MA	8772	9806	Hydrocodone	1145602.717	52900.01351	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
BM3887809	MARC'S 39MA	8772	2882	Alprazolam	1145602.717	24137.53273	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

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**From:** Graziano, David  
**Sent:** Friday, November 01, 2013 5:29 PM  
**To:** Foster, Timothy  
**Subject:** RE: CSCP Tracker

if you can, give me a quick call  
973 986 3535  
Monday is a long time for this to be on my mind.  
thanks  
dave

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**From:** Foster, Timothy  
**Sent:** Friday, November 01, 2013 5:25 PM  
**To:** Graziano, David; Lumpkin, Joe  
**Cc:** Moore, Andrew  
**Subject:** Re: CSCP Tracker

Its a grid I update for all the accounts in my markets...all I need is the result of a call  
I will call you Monday to discuss.

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**From:** Graziano, David  
**Sent:** Friday, November 01, 2013 05:23 PM

**To:** Foster, Timothy; Lumpkin, Joe  
**Cc:** Moore, Andrew  
**Subject:** Re: CSCP Tracker

Guys,

I am not aware of a grid, or the changes to be made. Either Tim or Joe please give me a call to discuss directly. I manage Marc's but Csmp issues have been organized through myself and Steve Schmidt the regional account customer service point of contact.

Thanks

Dave

973 986 3535

Sent from my iPhone

On Nov 1, 2013, at 5:07 PM, "Foster, Timothy" <[Timothy.Foster@McKesson.com](mailto:Timothy.Foster@McKesson.com)> wrote:

Dave...Just let me know when the call was made and the reaction and I will document on the grid.

Thanks

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**From:** Lumpkin, Joe  
**Sent:** Friday, November 01, 2013 4:58 PM  
**To:** Graziano, David  
**Cc:** Moore, Andrew; Foster, Timothy  
**Subject:** RE: CSCP Tracker

Please provide the results of your calls directly to Tim.

Thanks,

Joe Lumpkin  
Regional Director, Regulatory Affairs  
McKesson Pharmaceutical, North East Region  
10504 McKesson Dr.  
Ruther Glen, VA 22546  
804-448-4142 Ofc  
804-683-4670 Cell  
804-448-4573 Fax

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**From:** Graziano, David  
**Sent:** Friday, November 01, 2013 4:33 PM  
**To:** Moore, Andrew; Foster, Timothy; Lumpkin, Joe  
**Subject:** RE: CSCP Tracker

Joe,

I have a few calls to make now, but will call your cell as soon as I can  
thanks  
dave

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**From:** Moore, Andrew  
**Sent:** Friday, November 01, 2013 4:23 PM  
**To:** Foster, Timothy; Lumpkin, Joe  
**Cc:** Graziano, David  
**Subject:** RE: CSCP Tracker

That is correct and he has already talk with the account. Please check with Dave on this account.

Thanks  
AM

**Andrew Moore**  
Vice President & General Manager  
McKesson Northeast Region

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**From:** Foster, Timothy  
**Sent:** Friday, November 01, 2013 3:07 PM  
**To:** Lumpkin, Joe  
**Cc:** Moore, Andrew  
**Subject:** RE: CSCP Tracker

I will check with Dave Graziano as I believe he is the one calling Marcs.

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**From:** Lumpkin, Joe  
**Sent:** Friday, November 01, 2013 3:06 PM  
**To:** Foster, Timothy  
**Cc:** Moore, Andrew  
**Subject:** RE: CSCP Tracker

Thanks Tim! Although the outreach to some customers may be from another Sales area, I would hope that you would follow up with them to log the results. Since they are serviced from our DC's, we are still responsible for the contact and logging.

Joe Lumpkin  
Regional Director, Regulatory Affairs  
McKesson Pharmaceutical, North East Region  
10504 McKesson Dr.  
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**From:** Foster, Timothy  
**Sent:** Friday, November 01, 2013 2:48 PM  
**To:** Lumpkin, Joe  
**Cc:** Moore, Andrew  
**Subject:** CSCP Tracker

FYI ....Outreach was done today to the SE Ohio groups ( Klein's/ Euclid) and have been updated on grid.

Calls were also done to Medfast and Wayne and have been unreturned.

Andrew....I recall you saying Maces is being handled by the SE ( Graziano) in the Delran Market.

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## Suggested Talking Points and FAQs Regarding Decision to Significantly Reduce Thresholds

*Please note:*

- *The script is intended for verbal discussions with customers only; do NOT share this document with customers in written form.*
- *When sharing specific numbers, it is critical to avoid the appearance of coaching customers so that they can avoid scrutiny by McKesson or the DEA. Please continue to reinforce their corresponding responsibility per the below.*

### Talking Points

- We have conducted statistical analyses of the average pharmacy purchasing profile for your servicing DC. As a result of this regional/geographical market review, your thresholds have been reduced. We wanted to alert you to this change.
- Please be assured that this is a programmatic-based review across our customers generally.
- As awareness about the Rx drug abuse epidemic increases across the nation, we have found that customers have benefited from reviewing their own purchase data and comparing it to various benchmarks, such as the DEA national averages which we have previously referenced. This has provided some context for their exercise of corresponding responsibility.
- We review our own sales data for a regional perspective of our customer population.
- For example, for the regional market you are in, average Oxycodone purchases are [REDACTED] and less, average Hydrocodone purchases are [REDACTED] and less and Hydromorphone, Methadone, Morphine and Alprazolam each average around [REDACTED] or less.
- We hope this information will be helpful as you evaluate your own purchase data.
- We would like to caution though that our statistical analysis is intended to be dynamic, not static, as purchasing patterns and diversion trends change. Thus, these averages may change.
- We also would like to remind you that thresholds are not intended to allow you to manage against a number. We strongly believe that pharmacies should exercise their corresponding responsibility one prescription at a time.

**[If a customer expresses that they do not fit the average pharmacy profile or has some other circumstance for consideration:]**

- Please tell me why you think that. I can pass this information on to our regulatory affairs team.

**[Ensure to set expectations that the review process for threshold increases will take time. The amount of time will vary based on change requested and the level of validation provided by the customer]**

### FAQs

*Why are you making this change now?*

- We have implemented a more sophisticated data analyses process to set thresholds for our customers. We are analyzing [REDACTED] The statistical analysis is structured to be a dynamic, not static, as purchasing patterns and diversion trends change.

*What is my threshold? -OR- You used to tell me my threshold or tell me when I was getting close to my threshold – why can't you now?*

- We are not communicating specific thresholds or threshold warning reports. We believe this is a better practice. Thresholds are not intended to allow customers to manage against a number. We strongly believe that customers should exercise their corresponding responsibility one prescription at a time. Prescription drug abuse is an epidemic, and we all must do our part to fight this nationwide problem.

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To: Sales Associates  
What: Script & Talking Points Regarding RETAIL Controlled Substance Threshold Inquiries or Threshold Changes Being Made

**Background**

- As a pharmaceutical distributor, McKesson has the responsibility for helping to prevent pharmaceutical controlled substances from being diverted for nonmedical or other illegal purposes.
- Distributors are obligated to design and operate a system to detect and report suspicious orders. Suspicious orders include orders of unusual size, orders deviating substantially from normal patterns, and orders of unusual frequency.

If a customer calls with questions regarding an OMIT for controlled substances or about changes to our program, the following information is being provided.

- *The script is intended for verbal discussions with customers only; do NOT share this document with customers in written form.*
- **Customer calls because they received a controlled substance OMIT and they want to find out if they have reached their monthly threshold.**
  - If you are getting an OMIT, it means you've reached your monthly threshold.
- **Customer asks if we have changed their threshold.**
  - As a part of our controlled substance compliance program, we have and will continue to conduct reviews and make [REDACTED]  
[REDACTED]
  - We have implemented a more sophisticated data analyses process to set thresholds for our customers. We are analyzing [REDACTED]  
[REDACTED]  
[REDACTED]
  - I do not know if your specific threshold has been changed, but I do know that we are not communicating thresholds or providing threshold warning reports.
  - The statistical analysis is structured to be dynamic, not static, as purchasing patterns and diversion trends change.
- **Customer requests to know their exact monthly threshold limit.**
  - We are not communicating specific thresholds or providing threshold warning reports. We believe this is a better practice. Thresholds are not intended to allow customers to manage against a number. We strongly believe that customers should exercise their corresponding responsibility<sup>1</sup> one prescription at a time. Prescription drug abuse is an epidemic, and we all must do our part to fight this nationwide problem.

<sup>1</sup> See customer education material referenced in resource section at end of this document for details regarding a pharmacy's corresponding responsibility

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- **Customer requests a threshold increase.**

- We are not making any customer –requested threshold changes at this time. As indicated, thresholds are being set based on data analysis done [REDACTED]  
[REDACTED]

[If customer indicates need for an increase]

- If you believe you do not fit the average profile or have a circumstance for threshold consideration, I will be able to provide our Threshold Request Process in November. However, any requested changes may require significant validation by our regulatory team.

**Resources:**

- For additional information on industry trends and background materials, please reference the following resources that can be found on **FETCH**:  
<https://www.gosavo.com/fetch/CustomPage/View.aspx?id=1950281&srlid=21968783&srspfrm=False&sritidx=0&srpgidx=0&srpgsz=1>
- **Controlled Substances Sales Overview, August 2013**
- **McKesson customer educational piece, August 2013**
- **Other controlled substance reference materials:**
  - *Code of federal regulation that pertains to a pharmacist's corresponding responsibility*
  - *DEA presentation*
  - *NSDU – 2011 National Survey on Drug Abuse and Health: Mental Heath Findings*
  - *NIH- revised Dec 2012 - National Institute on Drug Abuse Report*
  - *AZ Bests practices*

**Websites:**

- [www.drugabuse.gov](http://www.drugabuse.gov)
- <http://www.deadiversion.usdoj.gov/>
- [www.whitehouse.gov/ondcp](http://www.whitehouse.gov/ondcp)
- [www.cdc.gov](http://www.cdc.gov)
- [http://www.samhsa.gov/data/NSDUH/2k11MH\\_FindingsandDetTables/Index.aspx](http://www.samhsa.gov/data/NSDUH/2k11MH_FindingsandDetTables/Index.aspx)
- [www.DEAChronicles.com](http://www.DEAChronicles.com)
- [www.GetSmartAboutDrugs.com](http://www.GetSmartAboutDrugs.com)
- [www.JustThinkTwice.com](http://www.JustThinkTwice.com)

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**Threshold Change Form****Request Date:**

<b>Customer Name:</b> _____	<b>Customer Contact Name:</b> _____
<b>Address:</b> _____	<b>Title:</b> _____
_____	<b>Phone:</b> _____
_____	<b>Customer Account Number:</b> _____
<b>DEA number:</b> _____	_____

**Economost Number, Description or Base Code**      **Dosage amount requested:**

1. CS requested: \_\_\_\_\_ +/- amount
2. CS requested: \_\_\_\_\_ +/- amount
3. CS requested: \_\_\_\_\_ +/- amount
4. CS requested: \_\_\_\_\_ +/- amount
5. CS requested: \_\_\_\_\_ +/- amount

**Customer-provided reason for requested change (BE SPECIFIC):****Submitted by:**

Name/Title: \_\_\_\_\_ Date: \_\_\_\_\_

DRA Approval \_\_\_\_\_ Denial \_\_\_\_\_ by: \_\_\_\_\_

DRA Name: \_\_\_\_\_ Date: \_\_\_\_\_

Sr. DRA / SVP Distribution Operations (if required) Approval \_\_\_\_\_ Denial \_\_\_\_\_ by: \_\_\_\_\_

Name: \_\_\_\_\_ Date: \_\_\_\_\_

Administrative note: All Threshold Change Request Forms (both accepted and denied) are to be maintained in the customer's Due Diligence File.

Confidentiality Notice: This form, including any attachments, is for internal use only and may contain confidential, proprietary and/or privileged information of McKesson Corporation, its affiliates, and/or its customers. Any unauthorized review, use, disclosure or distribution is prohibited

November 1, 2013